

UB-04 Implementation and NPI

Implementation Date

The NUBC is not extending the implementation date for the UB-04. The transition should be completed by May 23, 2007. This also coincides with a CMS notice that indicates they will not accept UB-92s after May 22, 2007.

NPI Contingency: NPI and Legacy ID Reporting on UB-04

The reporting of the NPI on the UB-04 follows the [NPI Final Rule](#) and subsequent [Guidance on Compliance](#) with the HIPAA National Provider issued by CMS (“contingency notice”). The recent NPI contingency notice has no effect on the implementation date of UB-04.

The UB-04 allows the reporting of the NPI, a legacy ID number, or both. **The NUBC is recommending reporting both numbers on the UB-04 if they are readily available during the CMS contingency period** (the 12 month period after the compliance date (i.e., through May 23, 2008)). This contingency period provides additional time for conducting testing that can eventually lead to exclusive NPI only claims. Please note that providers should report only the legacy number as the provider identifier on UB-92 forms.

The NPI contingency notice recommends increasing communication with health plans and others about NPI readiness. The purpose of the communication is to determine whether a health plan has adopted a contingency plan and the specifics surrounding their plan (duration, testing, etc.). The approach providers should follow will be based on readiness on their part, that of their trading partners, and whether testing and vendor system support is available.

We have learned that a few Medicaid programs will not be ready for the UB-04 by the May 23, 2007 date. As an alternative to maintaining two concurrent paper systems (one for the UB-92 and one for the UB-04), we would encourage providers to submit claims electronically using the HIPAA 837 transaction standard.